UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

September 30, 2013

MEMORANDUM

SUBJECT: Quarterly cap inspection at the San Jacinto River Waste Pits superfund site

FROM: Valmichael Leos, Federal On-Scene Coordinator
Emergency Readiness Team (6SF-PE)

TO: File

I. PURPOSE

This memorandum is to document the observations of the quarterly cap inspection at the San Jacinto River Waste Pits superfund site (Site) conducted on September 25, 2013. The purpose of the site visit was to inspect the completed removal work which involves a temporary armor cap being used to stabilize the release of dioxin / furan hazardous waste from releasing into the San Jacinto River.

II. BACKGROUND

The Site consists of impoundments, approximately 14 acres in size, built in the mid-1960s for the disposal of paper mill wastes and the surrounding areas containing sediments and soils potentially contaminated by the waste materials that had been disposed of in these impoundments. The impoundments are located immediately north of the I-10 bridge and on the western bank of the San Jacinto River in Harris County, Texas. A time-critical removal action was completed in July of 2011 to stabilize the pulp waste material and sediments within the impoundments to prevent the further release of dioxins, furans, and other chemicals into the environment. The removal consisted of placement of an armor rock cap over a geotextile bedding layer and an impermeable geomembrane in some areas.

In accordance with the operations, monitoring, and maintenance (OMM) plan for the Site, the respondents are required to conduct quarterly cap inspections starting January 2012 for the first two years, semi-annually from years three to five, and annually after year five. In addition to the regularly scheduled cap inspections, impromptu inspections may be conducted if a major storm event occurs at or near the site that could adversely affect the protectiveness of the removal action.

The site inspections involve visually inspecting the armor cap for areas of erosion, damage, wear and tear of any exposed geotextile fabric or LLDPE geomembrane liner, topographic surveys, manual probing to ensure the cap maintains the prescribed design thickness, and chemical analysis of surrounding pore water. In addition to land and water based inspections of the cap, visual inspections of the site security and perimeter fencing

is also conducted. The respondents are required to conduct topographic surveys of the armor cap to ensure a minimum design thickness of the armor cap. If any deficiencies are discovered during the site inspection by either the respondents or the EPA, response procedures for repair have been established in the OMM plan.

III. CONCULSIONS

On September 25, 2013, EPA OSC Leos conducted a site visit to document observations at the San Jacinto River Waste Pits superfund site. During the site visit it was noted that the Site security fencing visible and intact. Site signage placed along the fencing perimeter was visible and intact.

Although the site signage was visible and intact, there was however noticeable vegetative growth surrounding various site signage (See attached photos) that if left unattended would restrict the visibility. Signage needing immediate attention of particular note was along the security fencing South of IH-10 near the southern gate and along the bank of the San Jacinto River West of the armor cap. In general, EPA is recommending that all site signage be reevaluated to ensure no vegetative growth restricts the visibility. In addition to general vegetative site maintenance around the security fencing and site signage, the EPA is recommending that a review of the southern and central berm be conducted to ensure that the vegetative growth on top of the armor cap (See attached photos) does not in any way compromise or degrade the integrity of the armor cap. If left unattended these localized spots of vegetative may have roots that could tear holes or otherwise compromise the integrity of the geomembrane underneath the armor cap thus exposing the waste materials.

During this Site inspection, a trespasser (See attached photo) was encountered North of IH-10 along the Southern berm. I notified this man that he was trespassing and if he didn't leave the Site immediately I would call the local police to escort him off. He ignored my warning and proceeded to follow me in my rental car on the Site property. I left the Site temporarily, called the police, and waited for them to arrive. About 20 minutes later the cops arrived and escorted the disoriented, bare foot, man off the Site property. Although there was no noticeable holes or gaps in the security fencing, EPA is recommending a complete walk though of the entire fence line to ensure the fencing integrity.

The section of the armor cap located above water level was observed to be intact with no areas of cap erosion evident. A review of the respondents quarterly cap inspection report dated August 12, 2013, which includes a map of topographic surveys completed, have indicated no problematic areas needing cap repair or maintenance. The next quarterly cap inspection is scheduled in January 2014.

Enclosure:- Site Inspection Photos

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Site Inspection Photos
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Photo 1- View of Site signage surrounded by vegetative growth South of IH-10 along Eastern bank of San Jacinto River

Photo 2- View of Site perimeter fencing East Gate along IH-10, East of San Jacinto River

Photo 3- View of Site perimeter fencing Southern Gate, West of San Jacinto River

Photo 4- View of Site perimeter fencing Main Gate North along I-10, West of San Jacinto River with Trespasser inside

Photo 5- Picture of trespasser who was visibly disoriented, bare foot, with bloody arms and hands

Photo 6- Picture of Site signage with vegetative growth from street level along fencing South of IH-10 near southern gate

Photo 7- Picture of Site signage along fencing with vegetative growth from street level along fencing South of IH-10 near southern gate

Photo 8- View of southern berm west of central berm with vegetative spots growing out of armor cap

Photo 9- View of central berm with vegetative spots growing out of armor cap